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VIA ECF AND E-MAIL

Honorable Stuart M. Bernstein
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004

Re: Picard v. Glantz, et al., Adv. Pro. No. 10-05394 (SMB)

Dear Judge Bernstein:

We represent Irving H. Picard, Trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff, in the above-referenced adversary proceeding.

We respectfully request permission to file a brief in opposition to Defendants' Motion to Dismiss Trustee's Amended Complaint filed on May 1, 2015 ("Defendants' Motion") in excess of the page limit specified in your Honor's Chambers Rules and of no more than sixty (60) pages in length. This increase in the page limit is necessary to fully address each of the fifteen distinct arguments raised in Defendants' Motion, including the fact-intensive issue of actual knowledge as it relates to Defendants' ability to invoke the safe harbor contained in section 546(e) of the Bankruptcy Code. Prior to filing their moving brief, Defendants, with our consent, requested and obtained the Court's permission to file a moving brief of up to sixty pages. The current deadline to file the Trustee's opposition brief is August 14, 2015.

Defendants have indicated to the Trustee that they do not object to this request. We appreciate Your Honor's attention to this matter.

Respectfully submitted,

/s/ Jonathan B. New

Jonathan B. New

cc: Richard E. Signorelli (via e-mail: rsignorelli@aol.com)

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